

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JOHN L. BULLOCK,)	
)	
Plaintiff,)	
)	Case No. 2:10-cv-02482-SHM-cgc
v.)	
)	
WORLD SAVINGS BANK, FSB,)	
WACHOVIA MORTGAGE, MARY C. REEDER,)	
THE CITY OF MEMPHIS, PAMELA POPE)	
JOHNSON, MELISSA PALO,)	
)	
Defendants.)	

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AS TO PLAINTIFF'S
PETITION FOR ACTION TO QUIET TITLE**

COME NOW Defendants World Savings Bank, FSB, Wachovia Mortgage (properly referred to as Wachovia Mortgage FSB, the successor to World Savings Bank, FSB) and Mary C. Reeder (collectively, "Defendants"), by and through their undersigned counsel, and pursuant to Rule 56 of the Federal Rules of Civil Procedure submit this Motion for Summary Judgment as to Plaintiff's Petition for Action to Quiet Title.

As grounds for this Motion, Defendants state that Plaintiff has failed to respond to Defendants' First Set of Requests for Admissions ("Requests") to Plaintiff. Therefore, pursuant to Rule 36, all matters in the Requests are admitted, and no genuine issues of material facts remain in dispute. Accordingly, pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendants are entitled to a judgment as a matter of law on Plaintiff's Petition for Action to Quiet Title.¹ In support of this Motion, Defendants rely upon their Memorandum of Law in Support of

¹ By submitting this Motion for Summary Judgment, Defendants do not abandon their previously filed

their Motion for Summary Judgment, Defendants' Statement of Undisputed Material Facts, and the entire record before this Court.

Respectfully submitted,

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.

s/ Robert F. Tom

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Bank, FSB, Wachovia Mortgage and Mary
C. Reeder*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 10th day of March, 2011, a true and exact copy of the foregoing was filed using the CM/ECF system and served upon the following by first-class U.S. mail, postage pre-paid:

John L. Bullock
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s/ Robert F. Tom

Motion to Dismiss. To the contrary, Defendants are entitled to judgment in their favor based on the arguments in the Motion to Dismiss, and to the extent necessary, incorporate those arguments in this Motion for Summary Judgment.